

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GREAT WESTERN INSURANCE COMPANY,

Plaintiff,

v.

MARK GRAHAM, DONALD SOLOW, BLUE
CAPITAL MANAGEMENT, INC., BLUE
ALTERNATIVE ASSET MANAGEMENT LLC,
WILMINGTON SAVINGS FUND SOCIETY, FSB,
CHRISTIANA TRUST, REGATTA HOLDINGS
LLC, CYGNET 001 MASTER TRUST, CYGNET
001 MASTER TRUST SERIES 2011-A, CYGNET
001 MASTER TRUST SERIES 2011-C, CYGNET
MASTER TRUST SERIES 2013-A, ALPHA RE
LIMITED, ALPHA RE HOLDINGS (CAYMAN)
LIMITED, ATLANTIC SPECIALTY FINANCE,
BLUE ELITE FUND LTD., BLUE ELITE FUND
LP, BLUE II LTD., SANCUS CAPITAL BLUE
CREDIT OPPORTUNITIES FUND LTD.,
ABILITY INSURANCE COMPANY, JOHN
DRAKE, EDWARD BRENDAN LYNCH, AND
GREGORY TOLERAM,

Defendants.

CIVIL ACTION NO.
18-cv-06249 (VSB)

**DECLARATION OF MARK GRAHAM IN SUPPORT OF BLUE DEFENDANTS'
MOTION TO DISMISS AGAINST BLUE II, LTD. FOR PERSONAL JURISDICTION**

MARK R. GRAHAM declares as follows:


1. I serve on the Board of Directors of Blue II, Ltd., one of the defendants in this action. I make this declaration based on the knowledge I have gained through this role.

2. Blue II, Ltd. was established in 2012 with its present principal place of business at Whitehall House, 238 North Church Street, P.O. Box 1043, George Town, Grand Cayman KY1-1102, Cayman Islands. Blue II, Ltd. has maintained its principal place of business in the Cayman Islands, although at different local addresses, since its inception through today.

4. Blue II, Ltd. has never maintained an office in New York.
5. Blue II, Ltd. has never employed any persons in New York.
6. Blue II, Ltd.'s administrator is not located in New York.
7. Blue II, Ltd.'s custodian is not located in New York.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: October 31, 2018
New York New York


Mark R. Graham